

Below are my recommendations into the public record for changes in the current FCC regulations for the VRS (Video Relay Services).

1) That FCC upgrade their regulation of the Video Relay Service (VRS) because the VRS are not functionally equivalent to the kind of phone service that people who can hear and use the regular phone can get.

Below are VRS regulations suggested for FCC to develop:

A) Require that all equipment and hardware needed for VRS be interoperable. Rationale:
Sorenson's VP-100 is not interoperable with other Video Relay Services (VRS).

With the regular i2eye video phone from CSD/sprint, I can use the services of any VRS provider such as Hamilton, Sprint/CSD, HOVRS (Hands on VRS) and Sorenson. But with Sorenson's VP-100, I am limited to just the Sorenson VRS. I am speaking from personal experience as I have video phones from both Sorenson (VP-100) and Sprint/CSD. It doesn't seem right to be restricted to one service. If I was hearing, I could use my phone to make long distance calls with any long distance provider such as Verizon, Sprint, AT&T, MCI, Qwest, etc.

This practice on the part of Sorenson is very disturbing for the following reasons:

1) I can't use the Sorenson VP-100 to call friends unless they also have the Sorenson VP-100 or if they've taken the trouble to get an ip name.

2) Sorenson users can't call me if I'm using a regular dlink VP unless they have my ip name.

3) Deaf or hearing children of hearing parents would not be able to call their hearing or deaf parents because the d-link VP and the VP-100 are not interoperable.

4) And with the SorensonVP-100, my choice of VRS is restricted.

The only way a Sorenson VP-100 user could call a d-link VP user would be for the d-link VP user to get an ip name. Getting an ip name involves the use of a computer which many may not have and a level of sophistication that is beyond average person to understand. I'm well educated and sophisticated, yet needed to be talked through getting an ip name for myself to share with others.

I do not plan to use the Sorenson VP-100 and expect that because Sorenson is able to keep track of how their VP100 is used, they will probably ask me to return it. When this happens, Sorenson VP users will not be able to contact me without my ip name and I won't be able to contact them unless they get an ip name.

Isn't this kind of monopoly illegal and doesn't this discourage competition? I should have access to all VRS and pick the one that I feel provides the best service. So far I've been using the different services and already have a good idea which service is superior and

which leaves something to be desired.

And finally, hearing people have freedom of choice regarding their local and long distance carrier and the local and long distance carrier of choice of the person being contacted is irrelevant. Should us deaf VP users have the same rights in choosing our VRS provider?

B) Require all VRS to respond to calls within 10 seconds.

I did research with 4 different VRS in the past week. If I was unable to get VRS within 30 seconds, I hung up and called a different VRS. With this approach, I had the following experience with Sorenson, Hands On VRS (HOVRS), Hamilton, and Sprint-CSD:

Sorenson: With 3 attempts, I was unable to reach VRS within 30 seconds. Also Sorenson is the only VRS that provides service from sometime late at night through early morning.

HOVRS: With 3 attempts, I was able to reach them in 5 seconds, 20 seconds, and failed once to get them within the 30 second limit.

Hamilton: With 3 attempts, I was able to reach them in 15 seconds and 8 seconds, but got a busy signal once.

Sprint-CSD: I was able to reach them in 5 seconds, 5 seconds, and 8 seconds.

I also object to Sorenson's VP-100 limiting the user to use only the Sorenson VRS. Their speed of response to my calls is the worst of the four as I was unable to get them with 3 attempts in less than 30 seconds. I have been in touch with other people who are using the Sorenson VP-100 and they shared that it takes several minutes, sometimes as long as 20 minutes, before they are able to get them. I also am unhappy that the other VRS are not available for VRS calls during the late night to early morning hours.

I will be traveling for the next couple of months and will not be bringing the VP with me so that I can use the VRS. Upon my return, I plan to resume this research of calling each VRS and documenting the results to share with you. But please get involved and regulating the VRS by establishing minimum standards like those established for the traditional relay service (Telecommunications Relay Service or TRS) so that VP users can receive phone services that are functionally equivalent to hearing people using their phone.

C) Require all VRS to be available 24 hours a day, 7 days a week.

Sorenson is the only VRS that meets this 24/7 concept, but Sorenson is the slowest for the VRS to respond to calls.